

**BEFORE THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2003-326-C

IN RE:

Analysis of Continued Availability of Unbundled)
Local Switching for Mass Market Customers)
Pursuant to the Federal Communication)
Commission's Triennial Review Order)
)

**ITC^DELTA COM'S SUPPLEMENTAL RESPONSE
TO BELL SOUTH TELECOMMUNICATIONS,
INC.'S FIRST SET OF INTERROGATORIES**

ITC^DeltaCom Communications, Inc. d/b/a ITC^DeltaCom d/b/a Grapevine and BTI Corporation (hereinafter "ITC^DeltaCom"), pursuant to the Procedural and Scheduling Order entered on October 22, 2003, hereby submits the following Supplemental Responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories.

SUPPLEMENTAL RESPONSES

26. For those end user customers to whom you only provide qualifying service in the State of South Carolina, please state the average monthly revenues you receive from each such end user customer.

RESPONSE: See ITC^DeltaCom's region-wide response to this question in its Supplemental Responses to BellSouth's First Set of Interrogatories filed December 17, 2003 in Florida PSC Docket No. 0300851-TP.

Additionally, gross local revenue for ITC^DeltaCom for South Carolina is set forth in the attached South Carolina Commission Report. Gross local revenue for BTI for South Carolina is set forth in the attached South Carolina Commission Report.

Response Provided By: Sara Plunkett/Jean Houck
4092 S. Memorial Parkway

34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE: See ITC^DeltaCom's region-wide response to this question in its Supplemental Responses to BellSouth's First Set of Interrogatories filed December 17, 2003 in Florida PSC Docket No. 0300851-TP.

35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE: See ITC^DeltaCom's region-wide response to this question in its Supplemental Responses to BellSouth's First Set of Interrogatories filed December 17, 2003 in Florida PSC Docket No. 0300851-TP.

37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in South Carolina.

RESPONSE: None. ITC^DeltaCom does not calculate market share. In an effort to be responsive, ITC^DeltaCom made its best estimate of what its local market share may be for the region. See ITC^DeltaCom's region-wide response to Interrogatory No. 36 in its Supplemental Responses to BellSouth's First Set of Interrogatories filed December 17, 2003 in Florida PSC Docket No. 0300851-TP.

38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in South Carolina.

RESPONSE: None. ITC^DeltaCom does not calculate market share. In an effort to be responsive, ITC^DeltaCom made its best estimate of what its local market share may be for the region. See ITC^DeltaCom's region-wide response to Interrogatory No. 36 in its Supplemental

42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DS0s? For instance, if a customer had 10 DS0s, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DS0s? If so, please provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DS0s.)

RESPONSE: ITC^DeltaCom was not able to provide any estimates. However, BTI installs channel banks at the customer's premises in order to provide service using a DS1 rather than multiple DS0s. Total cost: \$1,127.95 including a channel bank for \$895.00 and a CPE installation kit for \$232.95.

Response Provided By: Thomas Crosby, Senior Manager, Design Engineering

45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over which you evaluate the project?

RESPONSE: ITC^DeltaCom generally offers a local product on a term basis of one, two or three years for business products.

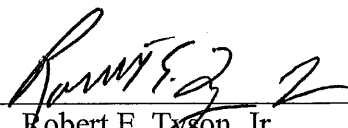
Response Provided By: Elisha Kusen

72. If Company disagrees with BellSouth's individual hot cut process, identify every step that Company contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE: BellSouth's individual hot cut process is not applied to all service types and is lacking in this respect. Its inefficiencies are in the actual scheduling; for example, the CLEC requests a specific time indicated in the DFDT field, then BellSouth responds with a different block of time which may span hours. This means the CLEC must have technicians on stand-by and possibly vendors, but the end user may have requested the hot cut during normal business hours or outside of normal business hours and BellSouth may have slotted between 3 and 9PM. BellSouth should develop a web based tool that allows CLECs to pre-select a window of time for the individual hot cut. This would reduce expense and improve service to the customer and the CLEC.

Response Provided By: Mary Conquest

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February 24, 2004

CERTIFICATE OF SERVICE

I, the undersigned employee of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for ITC Delta^Com Communications, Inc., do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es), unless otherwise specified:

Pleadings: ITC Delta^Com's Supplemental Responses to BellSouth Telecommunications, Inc.'s First Set of Interrogatories (in Docket No. 2003-326-C)

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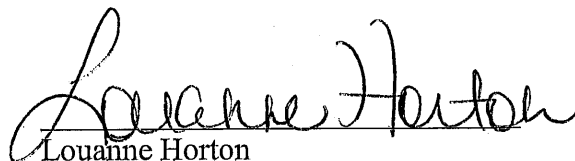
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